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POSTAL RATE COMMISSION
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POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

**AMERICAN BANKERS ASSOCIATION AND NATIONAL ASSOCIATION OF
PRESORT MAILERS ADDITIONAL JOINT INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS TO UNITED STATES
POSTAL SERVICE WITNESS LINDA A. KINGSLEY
(ABA&NAPM/USPS-T39-9-18)**

(December 10, 2001)

Pursuant to Sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the American Bankers Association and the National Association of Presort Mailers hereby submit these joint interrogatories and requests for production of documents. If the witness to whom an interrogatory is directed is unable to answer the interrogatory or produce the requested documents and another person is able to do so, the interrogatory or request should be referred to such person.

If data requested are not available in the exact format or level of detail requested, any data available in (1) substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The terms "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added

to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96.

ABA&NAPM/USPS-T39-9 For the purposes of this question, please assume (along with many economic studies which have so concluded) that the universal delivery system of the Postal Service is the "bottleneck" service insofar as postal services for the delivery of letter mail is concerned.

- a. Of the mail processing equipment currently fully or very widely deployed, would you agree that the CSBCS machinery and Delivery Point Sequencing (DPS) feature of DBCS equipment comes closest to being the bottleneck operation? (I. E., no large volume mailer could sort to delivery point for a carrier's route without some further work using the DPS feature of DBCS equipment, because no single mailer submitting processed mail to the Service would be supplying all the letter mail for any USPS carrier.)
- b. Of the mail processing equipment currently deployed, would you agree that upstream operations from AFCS, MLOCRs and RBCS come least close to being a bottleneck operation? (I.E., large volume mailers can (and do) perform all of the above functions with equipment identical to or nearly identical to USPS equipment.)
- c. By combining the DBCS/OCR/ISS/OSS operation in one technology, namely the DIOSS retrofit, is the Postal Service attempting to leverage its economic bottleneck in delivery further back into mail processing so that it can become more competitive with private sector mail processing capacity?
- d. Has the USPS done cost studies to justify DIOSS retrofits and the elimination of corresponding OCR/ISS/OSS capacity as DIOSS comes on board? If so, please provide a copy of all such studies.
- e. Please provide all documentation as to the source of the DIOSS concept, when it was first conceived, where and when it has been tested, and all cost-benefit analyses done other than those referenced in (d.) above.
- f. Is the USPS adding DIOSS in advance of the physical life of the older equipment embodying OCR/ISS/OSS capabilities? Or, is it adding DIOSS only after MLOCRs etc. have been fully depreciated?

- g. In a DIOSS - based world of mail processing and near-delivery functions, how do you intend to define cost pools in a way that separates the CSBCS bottleneck operation from the cost pools for the mail processing operations that currently are the bread and butter of large volume private sector operations?
- h. In your view would the Postal Service's extension of its bottleneck operations downstream in mail processing into more upstream operations constitute an effort to leverage its monopoly power in the bottleneck delivery function into mail processing?
- i. Would you agree that one possible option for the private sector in response to DIOSS would be to perform the DIOSS functions and possibly the CSBCS sortations at "super" presort bureaus, for pick up by the Service's carriers?

ABA&NAPM/USPS-T39-10 - On page 7 of your testimony you discuss additional stackers for CSBCSs to "sort additional volume" (line 9) and "allow for the consolidation of additional routes within a sort plan" (line 10).

- a. Please confirm that the Postal service's volume fell in PFY2000
- b. Please confirm that FCM letters subclass volumes are forecasted to fall in the current decade according to the GAO study introduced in R2000-1 as LR-179?
- c. In light of your answers to a. and b. above, why would the Postal Service be engaged in capital spending for more volume? Please supply all volume projections data you have for the 357 sites at which you plan to install these stackers.
- d. Would the extra stackers be cost justified if "additional volume" were factored out of the equation, and only "additional routes" were factored in? Please supply all costs studies that were done to justify the purchase and deployment, planned or actual, of the additional stackers.
- e. What will be the cost savings for additional routes/addresses once these stackers are installed, e.g. extra 100 routes cost before and after installation?
- f. Will these stackers reduce delivery costs or any other carrier costs compared to present that develop when an additional route/address is added to a carrier's work-load? Please cite any data the Postal Service has in support of your answer.

ABA&NAPM/USPS-T39-11 - If, as you state on page 12, line 4, the Postal Service has been working to eliminate “the need for manual casing by a carrier” with its automation system, why are carriers earning higher step pay as a result of automation and spending less time on the street?

ABA&NAPM/USPS-T39-12 - What is the marginal cost for letter mail processing operations through to CSBCS from (a) an extra address; (b) an extra letter; (c) an extra route (for the same carrier)?

ABA&NAPM/USPS-T39-13 - On page 13, lines 14-26, you again reference DIOSS deployment as a replacement for MLOCs.

- a. How many MLOCs do you intend to replace with DIOSS?
- b. In what time frame?
- c. What percentage of mail currently handled through manual processing do you expect to be handled by DIOSS? What are the unit cost savings and total cost savings expected?

ABA&NAPM/USPS-T39-14 - With respect to your discussion on page 25, under what cost pool(s) do robotic tray handling fall (each type), and tray management system (TMS) fall? Please provide the impact on these cost pools by unit cost from the deployment of each system in the plants in which each is currently used.

ABA&NAPM/USPS-T39-15 - With respect to your discussion about the “Commission’s insistence” about using its own mail processing volume variability methodology, please answer the following questions.

- a. If the Commission were to adopt the USPS methodology, would the Postal Service be willing to attribute all mail processing labor costs that were allocated to classes and subclasses other than the FCM letters subclass under the Commission’s methodology to those same classes and subclasses even if it altered cost coverages, *ceteris paribus*?
- b. Would your position on volume variability be different if various labor union agreements did not preclude you from reducing the number of personnel in mail processing as volumes fall?

ABA&NAPM/USPS-T39-16 - Has the USPS stopped or curtailed expenditures for productivity enhancing and cost reducing mail processing equipment for the FCM letters

subclass? Please cite any such slowdown or curtailment. Please compare it to what you have done in other subclasses, notably Standard A.

ABA&NAPM/USPS-T39-17 - For any and all such curtailed expenditures noted in 16. above, including any decisions made since your rate filing, please provide the impact by mail processing cost pool for TY2003.

ABA&NAPM/USPS-T39-18 – You state at page 4, line 22 of your testimony that MLOCRs have a staffing index of two clerks to feed and sweep, “its 60 stackers.” Please state how many MLOCRs the Postal Service has in total, how many of these have more than 60 stackers, and how many of these have between 60-100 stackers, 101-150 stackers, 150-200 stackers, over 250 stackers. At what number of stackers being utilized will an MLOCR require more than two clerks to staff it for feeding and sweeping?

Respectfully submitted,

AMERICAN BANKERS ASSOCIATION
NATIONAL ASSOCIATION OF
PRESORT MAILERS

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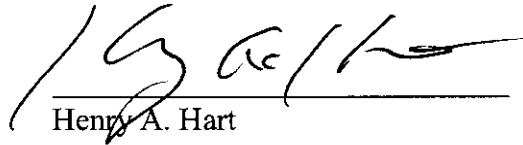
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.


Henry A. Hart

December 10, 2001